

Fletcher, Rachel

From: Cyran, Carissa
Sent: Thursday, July 8, 2021 11:58 AM
To: Fletcher, Rachel; Biscoe, Melanie
Subject: Re: Q&As RE: FOR REVIEW OPP IO comment on OPP Update CBD's Seresto comms material

Do you have additional language handy? If it's not a heavy lift, it would be great to beef up what I have. If not, I think it's fine since I know the web pages are a huge ask.

From: Fletcher, Rachel <fletcher.rachel@epa.gov>
Sent: Thursday, July 8, 2021 11:45 AM
To: Cyran, Carissa <Cyran.Carissa@epa.gov>; Biscoe, Melanie <Biscoe.Melanie@epa.gov>
Subject: RE: Q&As RE: FOR REVIEW OPP IO comment on OPP Update CBD's Seresto comms material

I think the red text sounds good. Do you want any more details about why the info we have on incidents prior to our additional request was not enough information to cancel?

From: Cyran, Carissa <Cyran.Carissa@epa.gov>
Sent: Thursday, July 8, 2021 11:18 AM
To: Fletcher, Rachel <fletcher.rachel@epa.gov>; Biscoe, Melanie <Biscoe.Melanie@epa.gov>
Subject: Re: Q&As RE: FOR REVIEW OPP IO comment on OPP Update CBD's Seresto comms material

Thoughts on this revision (red text).

From: Cyran, Carissa <Cyran.Carissa@epa.gov>
Sent: Wednesday, July 7, 2021 5:41 PM
To: Fletcher, Rachel <fletcher.rachel@epa.gov>; Biscoe, Melanie <Biscoe.Melanie@epa.gov>
Subject: Re: Q&As RE: FOR REVIEW OPP IO comment on OPP Update CBD's Seresto comms material

There is a comment from Jan on the 2nd question asking that we need to explain why the info we have on incidents prior to our additional request was not enough information to cancel.

Are you able to review and address? I am looking through comms and press inquiries now.

1. Why is EPA allowing continued use of the Seresto pet collar products given the data on reported incidents? Why isn't EPA canceling the Seresto registration?

The safety of all pesticide products is of highest priority to EPA. The agency works every day to ensure that products in the marketplace do not present unreasonable adverse effects.

EPA understands the concerns of pet owners who seek to protect their pets from troublesome fleas and ticks, and their fear following reports of these incidents that the remedy may be worse than the problem. Since ticks are public health pests – various tick species transmit diseases such as Lyme disease, tickborne relapsing fever, ehrlichiosis, and Rocky Mountain spotted fever – FIFRA requires EPA to weigh any risks of the pesticide against the benefits of controlling vector-borne diseases.

The agency is actively working with Elanco and Bayer to further understand the full context on the Seresto incidents. Within FIFRA authority, the agency required the company to provide additional

information to better characterize the nature and scale of the incident reports. This reporting is more extensive than standard reporting practices.

EPA always encourages consumers to read and follow all pesticide product labels. Product labels are the law, and they are a vital part of the agency's efforts to ensure that consumers have the information they need to safely, legally, and effectively use EPA-approved pesticide products. The agency collects incident data to inform its risk assessments and mitigation decisions and takes reports of incidents like these very seriously.

Consumers whose pet may experience adverse reactions with use of a Seresto pet collar should notify their veterinarian and may also want to contact the [National Pesticide Information Center](#), an EPA information-sharing partner that has staff who are specially trained in responding to pesticide exposure incidents, including those involving pets. For flea and tick collars specifically, pet owners should remove the collar immediately if the pet experiences any adverse reaction.

From: Fletcher, Rachel <fletcher.rachel@epa.gov>

Sent: Wednesday, July 7, 2021 12:54 PM

To: Cyran, Carissa <Cyran.Carissa@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Biscoe, Melanie <Biscoe.Melanie@epa.gov>

Subject: RE: Q&As RE: FOR REVIEW OPP IO comment on OPP Update CBD's Seresto comms material

Hi Carissa,

I added one comment on the Q&As.

Best,

Rachel

From: Cyran, Carissa <Cyran.Carissa@epa.gov>

Sent: Wednesday, July 7, 2021 12:05 PM

To: Britton, Cathryn <Britton.Cathryn@epa.gov>; Fletcher, Rachel <fletcher.rachel@epa.gov>; Biscoe, Melanie <Biscoe.Melanie@epa.gov>

Subject: Re: Q&As RE: FOR REVIEW OPP IO comment on OPP Update CBD's Seresto comms material

Thank you for the update! Rachel, just let me know when you're done and I will move them to Elissa/Tim and OGC.

From: Britton, Cathryn <Britton.Cathryn@epa.gov>

Sent: Wednesday, July 7, 2021 12:00 PM

To: Cyran, Carissa <Cyran.Carissa@epa.gov>; Fletcher, Rachel <fletcher.rachel@epa.gov>; Biscoe, Melanie <Biscoe.Melanie@epa.gov>

Subject: Q&As RE: FOR REVIEW OPP IO comment on OPP Update CBD's Seresto comms material

Hi Carissa,

Just wanted to let you know Rachel plans to review the Q&As by 1 PM. I'm copying Melanie in case there are any other questions or comments that come up.

Thanks again,
Cathryn

From: Cyran, Carissa <Cyran.Carissa@epa.gov>

Sent: Tuesday, July 06, 2021 7:01 PM

To: Fletcher, Rachel <fletcher.rachel@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Biscoe, Melanie <Biscoe.Melanie@epa.gov>

Subject: Re: FOR REVIEW OPP IO comment on OPP Update CBD's Seresto comms material

Also, management has asked that we pull together a few Qs&As. Can you please review and add additional language specifically in regard to the petition as well as any other questions you think needed?

Is it possible to have the Qs&As by noon tomorrow? I apologize for the quick turnaround, but I want to make sure we have time to clear Elissa and OPP IO, which is where the comms are now for review.

[CBD Seresto Petition, Internal Qs&As](#)

From: Cyran, Carissa <Cyran.Carissa@epa.gov>

Sent: Tuesday, July 6, 2021 5:24 PM

To: Fletcher, Rachel <fletcher.rachel@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Biscoe, Melanie <Biscoe.Melanie@epa.gov>

Subject: FOR REVIEW OPP IO comment on OPP Update CBD's Seresto comms material

Hello,

Jan who is acting for Mike while he is acting for Ed, had a comment on the listserv about posting the summary or the analysis itself. Do you know what we will post? Are you ok with the revised paragraph below (new text in red)?

Having received the requested data, EPA is currently in the process of analysis, possibly to include collaborating with experts from other regulatory authorities, such as the U.S. Food and Drug Administration. Once completed, the agency will make available the final analysis. EPA will take appropriate action, if appropriate after the evaluation of the incidents is complete.

Just an FYI, I am working on the updating the other web pages that have been flagged.

From: Ozmen, Shamus <Ozmen.Shamus@epa.gov>

Sent: Tuesday, July 6, 2021 4:30 PM

To: Matuszko, Jan <Matuszko.Jan@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>

Cc: Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>

Subject: RE: OPP IO review: OPP Update and Web for CBD's Seresto comms material [Michal has singed this today]

Thank you very much Jan. We will address the comments of the OPP Update.

For the other webpages we definitely agree. Those are the same extra pages I mentioned this morning at the OPP Staff meeting that we are looking at in addition to the main related webpage. Your suggestions are exactly what we are addressing now and the web team should have mock up ready for them shortly.

From: Matuszko, Jan <Matuszko.Jan@epa.gov>

Sent: Tuesday, July 6, 2021 4:26 PM

To: Ozmen, Shamus <Ozmen.Shamus@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>

Cc: Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>

Subject: RE: OPP IO review: OPP Update and Web for CBD's Seresto comms material [Michal has singed this today]

I provided a couple of comments directly to the draft OPP update. Since this is such a hot topic, it would probably be a good idea to send a final clean version of the **OPP update** for Mike's quick approval when ready.

I hadn't previously looked at the web page(s) related to this and am not sure to what extent we are updating them. Regarding the draft web page, the first link is to the following page: Controlling Fleas and Ticks on Your Pet. I will note at the bottom of the page, we give instructions if the pet has an adverse reaction as follows: "If your pet experiences an adverse reaction, immediately bathe the pet with mild soap and rinse with large amounts of water." Seems like we should also include that if the reaction is to a collar, the collar should also be removed immediately (consistent with the OPP update). Similarly there is another page titled "What to Do if Your Pet has an Adverse Reaction to a Flea and Tick Product." Same comment is applicable to that page as well.

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I hope this is helpful.

Jan

From: Ozmen, Shamus <Ozmen.Shamus@epa.gov>

Sent: Tuesday, July 6, 2021 3:25 PM

To: Goodis, Michael <Goodis.Michael@epa.gov>; Matuszko, Jan <Matuszko.Jan@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>

Cc: Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>

Subject: OPP IO review: OPP Update and Web for CBD's Seresto comms material [Michal has signed this today]

Importance: High

Please find for your review the comms package for the CBD Seresto pet collar petition. Michal signed today so we will fast track this.

[CBD Seresto Petition, OPP Update](#)

[CBD Seresto Petition, Web Page Update](#) in Word for commenting

- [Mock-up web page update](#) (need to be on the VPN to view)

Thanks,

Shamus